

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:) NO: 11-46212-399
) CHAPTER 13
Reginald & Tamara Stovall,) Hearing Date: 5/8/13
) Hearing Time: 10:00 a.m.
Debtors.) Courtroom: 5 North

TRUSTEE'S AMENDED OBJECTION TO FIFTH AMENDED CHAPTER 13 PLAN

Comes now John V. LaBarge, Jr., Standing Chapter 13 Trustee,
and states as follows:

1. The Trustee cannot determine if the plan payments proposed by the fifth amended plan are appropriate until Debtors file an amended schedule I updating their incomes.
2. Based on recent pay advices provided to the Trustee:
 - a) Mr. Stovall started a new job with Baumann Property Co. On 2/10/13. *The last filed schedule I shows his former job at Douglas Ventures, LLC.
 - b) Mrs. Stovall's income in the last filed schedule I is understated significantly. Per pay advices, Mrs. Stovall's average income is \$3,257.90/mo gross and \$2,263.04/mo net. *The last filed schedule I says \$2,480.00/mo gross and \$1,427.40/mo net.

WHEREFORE, the Trustee prays that the Court deny confirmation of Debtors' Fifth Amended Chapter 13 Plan; and for such other relief as this Honorable Court deems necessary and just under the circumstances.

Respectfully Submitted,

/s/ Joseph M. Wilson
John V. LaBarge, Jr.
Chapter 13 Trustee
Joseph M. Wilson
FED#51849MO; MO#51849
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above Trustee's Objection was served this 1st day of May 2013, electronically via CM/ECF or by depositing same in the U.S. mail, postage pre-paid, addressed to:

/s/ Joseph M. Wilson

Ghafoor, Cook & Associates
136 E. Walnut
Independence, MO 64050

Reginald & Tamara Stovall
3513 Woodpath Dr.
Florissant, MO 63031